

HONORABLE STACIE BECKERMAN

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

CONSTANCE GEORGE

Plaintiff,

v.

HOUSE OF HOPE RECOVERY, et al.

Defendants.

NO. 3:15-CV-01277-SB

COUNSEL FOR THE
PLAINTIFF'S UNOPPOSED
MOTION TO WITHDRAW AS
COUNSEL FOR PLAINTIFF

I. CERTIFICATE PURSUANT TO LR 7.1

This Motion is made by Plaintiff's counsel, Moloy K. Good, (hereinafter "Plaintiff's counsel"). Plaintiff's counsel has conferred with counsel for each separate Defendant regarding this motion, and none of the counsel for Defendants oppose this Motion. Plaintiff's counsel has provided Plaintiff Constance George with a copy of this Motion.

II. MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

Pursuant to LR 83-11, Plaintiff's counsel respectfully moves this Court for an order allowing him to withdraw as counsel for the Plaintiff immediately.

Plaintiff's counsel seeks to withdraw for professional considerations. Trial in this case is set for March 13, 2018 which will allow Plaintiff Constance George adequate time to obtain new

NO. 3:17-CV-01557-BR; George v. House of Hope Recovery, et al.;
Counsel for Plaintiff's Motion to Withdraw as Counsel for Plaintiff –

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counsel prior to the trial. Moreover, Plaintiff's counsel will provide Plaintiff Constance George's new counsel with a copy of his attorney file as soon as he receives a notice of representation, and consent from Plaintiff.

If ordered, Plaintiff's counsel is willing to submit additional information under seal or in chamber, outside the presence of Defendants or Defendants' counsel.

No party will suffer any prejudice if the withdrawal is granted. Plaintiff's counsel is concerned that Plaintiff will suffer prejudice if the withdrawal is denied.

DATED this 27TH day of December, 2017.

THE GOOD LAW CLINIC
/s/ Moloy K. Good
MOLOY K. GOOD OSB #012636
(360) 694-4530
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of December, 2017, I served the foregoing Counsel for Plaintiff's Motion to Withdraw as Counsel for Plaintiff, and the Declaration of Moloy Good in Support of Counsel for Plaintiff's Motion to Withdraw as Counsel for Plaintiff on the following parties at the following addresses:

Rebecca Cambreleng
CAMBRELENG LAW, LLC
806 SW Broadway, Suite 1200
Portland, OR 97205

*Of Attorneys for Defendants House of Hope
Recovery and Patricia Barcroft*

- ☒ ECF
- ☐ Hand Delivery
- ☐ Facsimile
- ☐ U.S. Mail
- ☐ Overnight Courier
- ☐ Email

Kyle T. Abraham
BARRAN LIEBMAN LLP
601 SW 2nd Avenue, Suite 2300
Portland, OR 97204

Of Attorneys for Defendant Bridges to Change

- ☒ ECF
- ☐ Hand Delivery
- ☐ Facsimile
- ☐ U.S. Mail
- ☐ Overnight Courier
- ☐ Email

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s/ Moloy K. Good
Moloy K. Good, OSB #012636
of Attorney for Plaintiff